

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

<p>CHICAGO WOMEN IN TRADES,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>PRESIDENT DONALD J. TRUMP, DEPARTMENT OF LABOR, ACTING SECRETARY OF LABOR VINCENT MICONE, OFFICE OF MANAGEMENT AND BUDGET, DIRECTOR OF THE OFFICE OF MANAGEMENT AND BUDGET RUSSELL VOUGHT, U.S. DEPARTMENT OF JUSTICE, ATTORNEY GENERAL OF THE U.S. DEPARTMENT OF JUSTICE PAMELA BONDI,</p> <p style="text-align: center;">Defendants.</p> <hr/>	<p>Case No. 1:25-cv-02005</p>
<p>FREEDOM NETWORK USA,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>PRESIDENT DONALD J. TRUMP, OFFICE OF MANAGEMENT AND BUDGET, DIRECTOR OF THE OFFICE OF MANAGEMENT AND BUDGET RUSSELL VOUGHT, U.S. DEPARTMENT OF JUSTICE, OFFICE OF JUSTICE PROGRAMS, OFFICE FOR VICTIMS OF CRIME, ATTORNEY GENERAL OF THE U.S. DEPARTMENT OF JUSTICE PAMELA BONDI,</p> <p style="text-align: center;">Defendants.</p> <hr/>	<p>Case No. 1:25-cv-12419</p> <p>JURY TRIAL DEMANDED</p>

MOTION FOR REASSIGNMENT PURSUANT TO LOCAL RULE 40.4

Plaintiff Freedom Network USA respectfully requests that this Court reassign the *Freedom Network USA v. President Donald J. Trump, et al.*, Case No. 1:25-cv-12419 to Judge Kennelly, before whom the substantially similar matter, *Chicago Women in Trades v. President Donald J. Trump, et al.*, No. 1:25-cv-02005 (N.D. Ill. Feb. 26, 2025) (the “CWIT Action”), is currently pending. A copy of the Complaint in *Freedom Network USA v. President Donald J. Trump, et al.* (the “FNUSA Action”), which is the higher numbered case, is attached hereto as Exhibit A. As required by Local Rule 40.4, the points of commonality between the CWIT Action and the FNUSA Action are as follows:

1. There is significant overlap of Defendants in both cases, *i.e.*, President Donald J. Trump, the Office of Management and Budget, Director of the Office of Management and Budget, the Department of Justice, and the Attorney General of the U.S. Department of Justice.

2. Both cases involve similar issues of law regarding the constitutionality of two Executive Orders President Trump signed on January 20 and 21, 2025, Executive Order 14151, titled “Ending Radical and Wasteful Government DEI Programs and Preferencing” and Executive Order 14173, titled “Ending Illegal Discrimination and Restoring Merit-Based Opportunity.” The common and ultimate goal of both cases is to prevent the imposition of unconstitutional requirements imposed by the Executive Orders on federal funding, and to challenge the illegal enforcement of these unconstitutional mandates.

3. The Plaintiffs in both cases have made essentially identical allegations that certain provisions of both Executive Orders violate the First Amendment of the U.S. Constitution, the Fifth Amendment of the U.S. Constitution, the Spending Clause (Article I, § 8 of the U.S. Constitution), and constitutional separation of powers. And Plaintiffs in both cases are suing to enjoin implementation and enforcement of these Executive Orders based on similar claims.

Local Rule 40.4 also requires that the present motion lay out the savings of judicial time and effort that would be met by reassignment as required by Local Rule 40.4(b). Those points are as follows:

1. Both cases are pending in this Court;
2. The handling of both cases by the same judge is likely to result in a substantial savings of judicial time and effort;
3. The CWIT Action, now stayed due to the government shutdown, has not progressed to the point where designating it as related would be likely to delay the proceedings in the FNUSA Action and;
4. *Freedom Network USA v. President Donald J. Trump, et al.* and *Chicago Women in Trades v. President Donald J. Trump, et al.*, are susceptible to disposition in a single proceeding.

Thus, for the foregoing reasons, the Plaintiff respectfully requests this Court accept reassignment of *Freedom Network USA v. President Donald J. Trump, et al.*, Case No. 1:25-cv-12419, the later-filed case.

Dated: November 13, 2025

Respectfully Submitted,

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**Pro hac vice pending*

Certificate of Service

I hereby certify that on November 13, 2025, a copy of the foregoing document was electronically served on all parties of record via CM/ECF.

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